



29 March 2021

Ms Jenny Chu
Major Projects
Department of Planning, Industry and Environment
NSW Planning Portal

Dear Ms Chu

Request for SEARS for St Phillips Christian College Charmhaven

It is understood that the Department of Planning Industry and Environment issued Secretary Environmental Assessment Requirements (SEAR's) for the proposed St Phillips Christian College, Charmhaven. Unfortunately we did not receive notification via the public authority portal. Council has reviewed the comments provided by other public authorities. Council requests that the following ecology and water and sewer comments are provided to the applicant for their consideration in the preparation of their EIS.

Ecology

The following comments are provided to assist the applicant in terms of what local site-specific ecology matters may need to be addressed in the EIS.

Biodiversity Offset Scheme

Most of the property is included on the NSW Biodiversity Values map and triggers entry into the Biodiversity Offset Scheme. The proposal will need to be accompanied by a BCAR prepared in accordance with the Biodiversity Assessment Method (BAM) for any proposed impacts to areas highlighted on the Biodiversity Values map (Fig. 1).



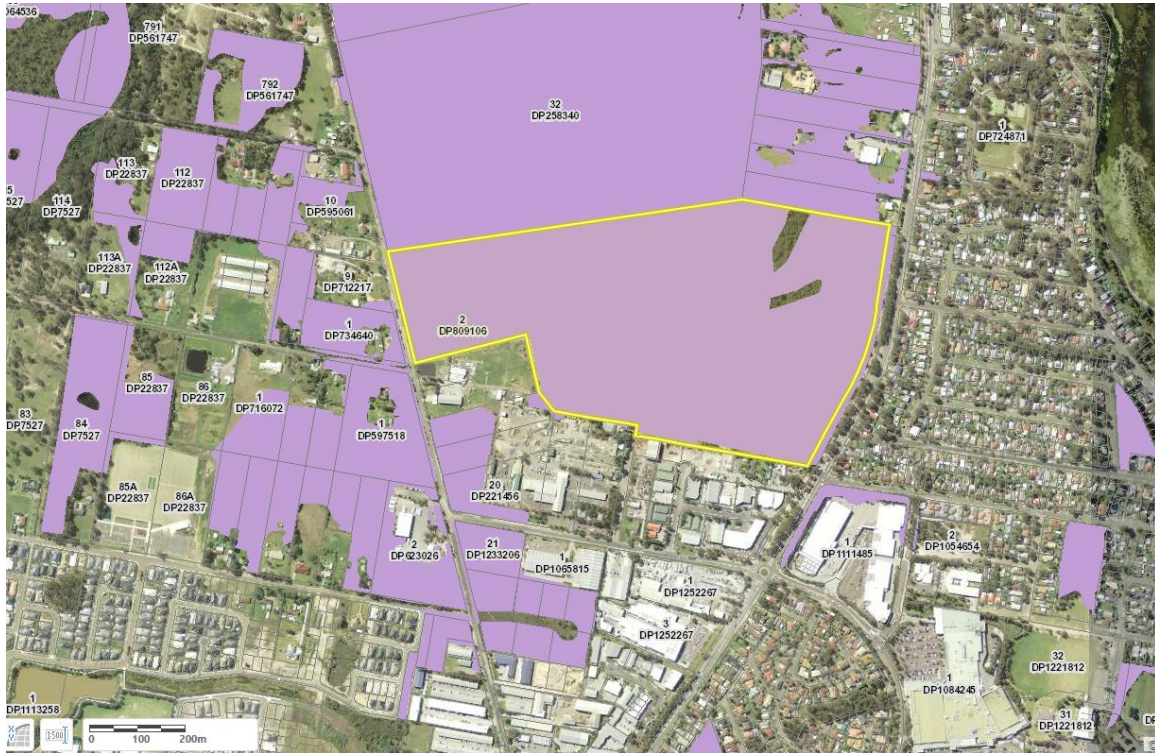


Figure 1. Biodiversity Values Map.

The Proposal should not be lodged until the BCAR has been finalised in accordance with the BAM.

Vegetation Communities

Council's mapping system identifies that two different plant community types occur on the site (Fig. 2). These Plant Community Types (PCT) include:

1. PCT 1636 - Scribbly Gum - Red Bloodwood - Angophora inopina heathy woodland on lowlands of the Central Coast; and
2. PCT 1649 - Smooth-barked Apple - Red Mahogany - Swamp Mahogany - Melaleuca sieberi heathy swamp woodland of coastal lowlands.

PCT 1649 forms part of the Endangered Ecological Community "Swamp sclerophyll forest on coastal floodplains of the NSW North Coast| Sydney Basin and South East Corner bioregions" listed under the Biodiversity Conservation Act (BC Act).

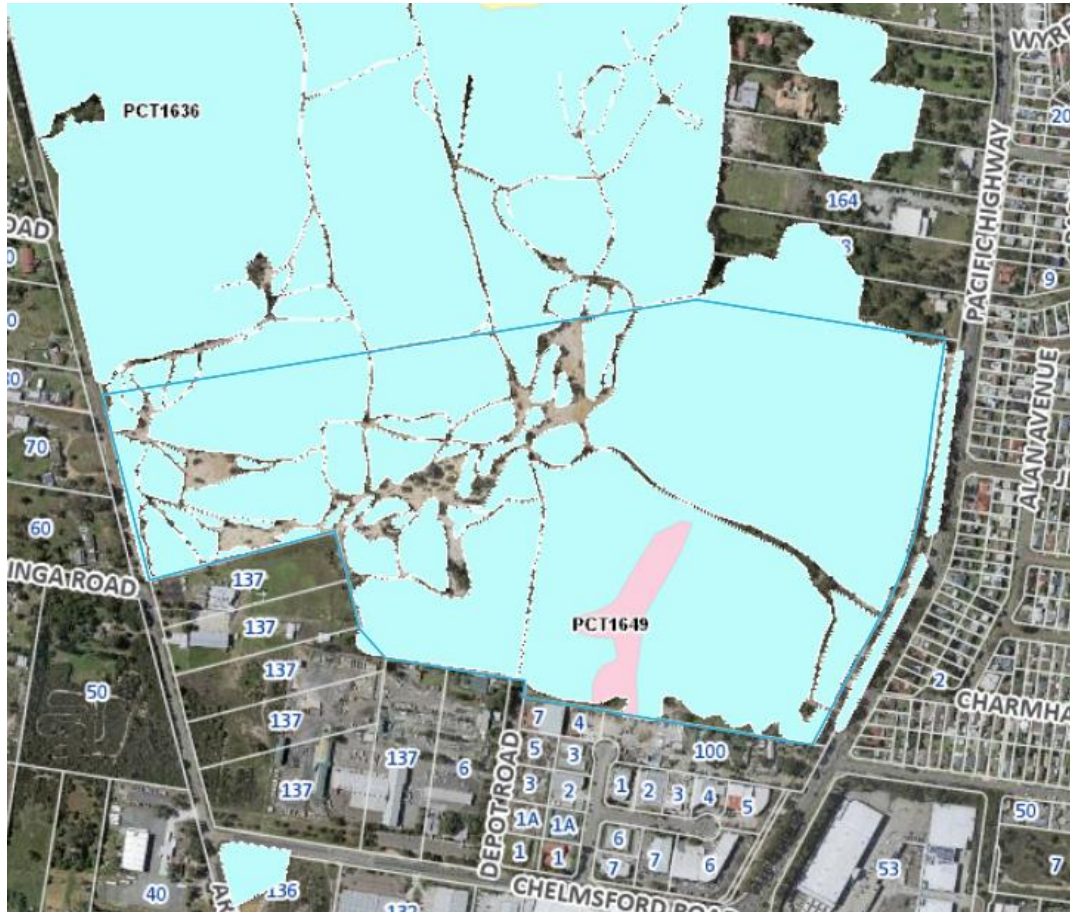


Figure 2. Plant community types (source Geocortex).

Threatened Fauna and Threatened Fauna Habitat

A number of records for the Squirrel Glider occur adjacent to the proposal site. Targeted surveys for this species will need to be conducted in accordance with the BAM.

The PCT 1636 - Scribbly Gum - Red Bloodwood - Angophora inopina heathy woodland on lowlands of the Central Coast typically contain a large number of hollow-bearing trees (HBTs). A hollow bearing tree survey will need to be conducted and all HBTs should be presented spatially and presented within the BCAR. Targeted surveys for hollow-dependent threatened fauna species will also need to be conducted in accordance with the BAM.

Rutidosia heterogama is known from adjacent sites, including the road reserve of Arizona Road, and may occur on site. This species requires seasonal survey.

Threatened Orchid Species

The proposal site contains exceptionally high-quality habitat for a range of threatened Orchid species. These species include but are not limited to:

- Leafless Tongue Orchid (*Cryptostylis hunteriana*)
- *Corunastylis* sp. Charmhaven
- Variable Midge Orchid (*Genoplesium insigne*)

In particular, the critically endangered orchids *Genoplesium insigne* and *Corunastylis* sp. Charmhaven have known significant populations on properties along Arizona Road. *Genoplesium insigne* and *Corunastylis* sp. Charmhaven are classed as 'Serious and Irreversible' (SAIL) species. As such, seasonal surveys during known flowering times are required to identify the presence of orchid species in accordance with the BAM. Seasonal surveys for orchid species should only be conducted when confirmation of a nearby reference population is in flower in accordance with the Threatened Biodiversity Data Collection (TBDC)

Council would advise the applicant's Ecologist to make a request to for the "as held" Bionet data for *Corunastylis* sp. Charmhaven, *Genoplesium insigne* and *Cryptostylis hunteriana*. This is to obtain accurate sighting location data.

Both the NSW TBDC and Council's Flora and Fauna Guidelines (2019) require surveys for orchids to be done at a time.

The proposal site contains high quality habitat including large number of observations in the north west portion of the site for Charmhaven Apple (*Angophora inopina*). This species is listed as vulnerable under state and federal legislation. Targeted surveys for this species are required to be undertaken in accordance with the BAM.

Swift Parrot Important Areas

The proposal site has been identified as a Swift Parrot Important Area (Fig. 3). In accordance with the BAM important mapped areas do not survey as it is presumed that the species is present. Any impacts from development could potentially be classed Serious and Irreversible.



Figure 3. Swift Parrot Important Areas.

Serious and Irreversible Impacts

Serious and Irreversible Impact assessment should be completed for all SAIL species and be presented within the BCAR.

Avoid and Minimise

The proposal area is highly constrained ecologically and the BCAR should address steps taken to avoid and minimise impacts on biodiversity values in accordance with BAM. **The applicant should engage an ecologist very early in the project to advise on constraints and areas that need to be avoided, based on the detailed site survey.** The application will have to demonstrate how biodiversity impacts have been first avoided and then minimised, before being offset.

The Study Area

The study area must include all areas likely to be directly impacted by the proposal and may include roads (including footpath, kerb and gutter), asset protection zones, stormwater infrastructure and water quality basins, water and sewer services to connection point. This includes road or any other areas outside the proposal area that may be impacted.





The proposal area must also include areas likely to be indirectly impacted. Indirect impacts such as altered flow regimes, noise, light, weeds and public access are to be assessed in accordance with the relevant sections of the BAM.

Environment Protection and Biodiversity Conservation Act 1999

Species listed under the Commonwealth *EPBC Act* require consideration of the significant impact criteria to determine if referral to the Commonwealth Department of the Environment is required. This is a separate assessment and approval process to the requirements of the NSW BC Act. If a referral is required, Council encourages proponents to consult with the Commonwealth Department of Environment prior to lodgement of the development application.

Water and sewer

The proposed development can connect into the existing Council sewer network of SPS CH01 catchment area which is located at the back of 6 Depot Road, Charmhaven. The existing station has capacity for the proposed 1500 students.

It is recommended that the applicant obtain a flow and pressure statement from Council to assist any internal hydraulic design (including provision for firefighting purposes).

Developer charges will be applicable for the proposed development.

A section 305 application is required, in order to obtain the s307 certificate of compliance prior to Occupation Certificate for the proposed development.

If you have any further enquiries, please contact Council's Senior Development Planner, Janice Wheeler on 4350 5782.

Yours faithfully

Andrew Roach
Unit Manager
DEVELOPMENT ASSESSMENT

JW, F2004/00537, D14561080

